May 05, 2009

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: **RM-11523**
ET Docket No. 09-38

Dear Ms. Dortch:

ON Semiconductor hereby supports the request of Starkey Laboratories (Starkey) to operate wireless hearing aid devices in the 902-928MHz band (also referred to as 915 MHz band) pursuant to Starkey's waiver request (ET Docket No 09-38) and petition for rule making (RM-11523).

Wireless connectivity for hearing aids has emerged over the past few years to become a major technical requirement for some speech processing algorithms in hearing aids, to improve safety as well as listening comfort for users, such as described by Starkey in its request for waiver.

ON Semiconductor is a leading supplier of silicon solutions to the hearing aid industry and understands well the very different requirements hearing aid applications impose on wireless connectivity. For example: Starkey noted that while there is existing spectrum centered around 217 MHz, which is allocated for use by hearing assisted devices, and which other hearing aid manufacturers have made good use of, Starkey's proposed applications are sufficiently different from those currently operating in that band that satisfactory operation of Starkey's devices in that band would not be possible. ON Semiconductor asserts that indeed the 217 MHz band would be inadequate for Starkey's proposed applications.

Another example of the need for additional spectrum for hearing aids is illustrated in the recent comments and ex-parte presentations ON Semiconductor submitted in the rulemaking for the newly defined MEDS band, at 405-406MHz (ET Docket Nos. 06-135, 05-213, 03-92; RM-11271). ON Semiconductor pointed out that for many wireless hearing aid applications, such as ear-to-ear communication, remote control, remote programming, etc.., the MEDS band would be ideal. It is very quiet spectrum and virtually worldwide deployable. However, this band is not available for wireless hearing aids use today, and it is uncertain when it could be made available for wireless hearing aid applications.

While Starkey's request will only allow operation in the US, it will nevertheless bring tremendous benefits to US hearing aid users while they are not traveling overseas with their wireless hearing aids.

In conclusion, ON Semiconductor asserts that Starkey's proposal, in light of the non-availability of the MEDS bands today, is an appropriate option for bringing the benefits of wireless hearing aids to the hearing aid users in the US; as such the FCC should authorize Starkey to deploy according to its request.

Respectfully submitted,

Michel De Mey
Senior Director
Hearing and Audio Solutions
ON Semiconductor
611 Kumpf Drive, Unit 200
Waterloo, Ontario N2V 1K8
T: (519) 884 9696

Robert Tong
Vice President
Medical Division
ON Semiconductor
611 Kumpf Drive, Unit 200
Waterloo, Ontario N2V 1K8
T: (519) 884 9696